

1. Will authorization of supplemental audio channel capability encourage your station to convert to digital broadcasting?

The promise of doubling the capacity for public service broadcasting via multiplexing – implementing supplemental audio channels - decisively tilts the cost-benefit ratio in favor of radio digital conversion. In effect, stations will be able to create a second statewide network "overnight," delivering more of the choice and diversity of local programming to rural Americans, which they otherwise may not enjoy. We are dedicated to serving the public interest and this major innovation would be a giant step forward, to that end.

2. How will your station use a supplemental audio channel?

Boise State Radio would implement supplemental radio service for Idaho citizens. Our current plans include establishing a 24-hour, seven days per week jazz music programming where it does not presently exist.

We are considering minority citizen service for Hispanics in the state. We are also considering other expanded information possibilities as well. Multiplexing offers public service broadcasters their greatest and most substantive hope to accomplish their mission. Multiplexing also provides Idaho with a very cost-effective means of expanding the quality and quantity of local, diverse programming and maximizing our service in our state for many who otherwise will never be served by public or commercial radio.

3. Explain how a supplemental audio channel will allow your station to improve and expand services to current and new audiences. Does the availability of an additional audio programming channel enhance local offerings and encourage programming and audience diversity?

Boise State Radio will make far more efficient use of its licensed spectrum in the public's interest by offering new and separate streams of programming for audiences either under-served or not served at all by any broadcaster. And these services would be offered by broadcasters from within the state, at a time when radio is increasingly created and run from distant, out-of-state large corporations with no local ties or interest.

With multiplexing capability, we could provide more public service to more Americans, effectively, locally, and importantly – efficiently. Multiplexing

Is highly cost effective. Resources saved could be invested, instead, into programming for new audiences.

4. What local community groups or organizations could benefit from supplemental audio channel authorization and support your use of this capability?

Multiple networks serving much of the state would be established, each serving citizens in large part unserved today. Boise State Radio is committed to developing the iBiquity technology so that Radio Reading Services may be offered via Stations' digital spectrum for reception by generally available radio receivers.

5. What regulatory steps will best support the FCC's goal of fostering and protecting public service programming?

Approving the use by current licensees of their licensed spectrum for multiplexing purposes and with the flexibility to determine themselves the local services best suited and able to be supported and sustained is the most significant step we would ask the Commission to support. We also believe that digital service rules applicable to Radio Reading Service operations should be consistent with the analogous requirements of Section 73.593 governing analog Radio Reading Services.

Boise State Radio, and indeed public radio licensees across the country have an excellent track record of adhering not only to the letter but also to the spirit of the requirement to serve the public's interest in local communities, one by one, across the nation. To the extent that multiplexing might provide revenue to support that public service mission, we ask that the Commission allow such use. Our mission is to inform and to educate, which, in our opinion is the highest use for which the public's airwaves can be used. We would ask the Commission to consider this dedication and commitment and to provide non-commercial educational stations with the technical and regulatory flexibility to strengthen and support our proven ability to serve the public interest and needs with our programming mission.

We are energized by the prospects and opportunities for public service broadcasting that multiplexing can provide.

Signed:

General Manager